

**KEMP & KEMP**  
ATTORNEYS AT LAW  
7435 W. Azure Drive, Suite 110  
LAS VEGAS, NEVADA 89130  
Tel. (702) 258-1183 • Fax (702) 258-6983

JAMES P. KEMP, ESQUIRE  
Nevada Bar No. 006375  
KEMP & KEMP, ATTORNEYS AT LAW  
7435 W. Azure Drive, Suite 110,  
Las Vegas, NV 89130  
(702) 258-1183 tel./ (702) 258-6983 fax  
[jp@kemp-attorneys.com](mailto:jp@kemp-attorneys.com)  
Attorney for Plaintiff Thomas Mooney

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

THOMAS MOONEY,

Plaintiff,

v.

FIFE DERMATOLOGY, PC, d/b/a  
SURGICAL DERMATOLOGY & LASER  
CENTER; DOUGLAS FIFE, M.D.; and  
HEATHER FIFE,

Defendants.

CASE NO. 2:17-cv-02191-JCM-DJA

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF TO  
REPLY TO DEFENDANT'S OPPOSITION  
PLAINTIFF'S MOTION FOR LEAVE TO  
FILE SECOND AMENDED COMPLAINT**

**(Second Request)**

The parties, by and through their respective counsel, hereby stipulate to extend the time for Plaintiff to reply to Defendants' OPPOSITION TO PLAINTIFF'S MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT (ECF No. 54) from the current due date of Thursday, August 12, 2021 through and including **Friday, August 20, 2021.**

This is the second request for an extension of this deadline. The parties provide the following information to the Court regarding the proposed extension of time:

1. Plaintiff's counsel has been delayed in completing work over the past several weeks due to illness in his family that he has been required to attend to. This situation has continued longer than expected with his

**KEMP & KEMP**  
ATTORNEYS AT LAW  
7435 W. Azure Drive, Suite 110  
LAS VEGAS, NEVADA 89130  
Tel. (702) 258-1183 • Fax (702) 258-6983

1 mother having just been released from the hospital this week. He has  
2 informed Defendants' Counsel of the details of this and the parties agree to  
3 a an additional extension of the Plaintiff's deadline until Friday, August 20,  
4 2021 to file a Reply to the Opposition.

5  
6 2. Plaintiff's counsel also has an Opening Brief due to the Ninth Circuit Court  
7 of Appeals on August 18, 2021 that is taking a great deal of time.

8 3. There are no other deadlines or proceedings with which this extension  
9 would interfere.

10 This stipulation to extend the deadline is made in good faith and not for purposes of delay.

11  
12 DATED this 12<sup>th</sup> day of August, 2021.

DATED this 12<sup>th</sup> day of August, 2021.

13  
14  
15 /s/ P. Swen Prior  
16 P. SWEN PRIOR, ESQ.  
17 SNELL & WILMER  
18 3883 Howard Hughes Pkwy., #1100  
19 Las Vegas, NV 89169  
20 Attorney for Defendants

/s/ James P. Kemp  
JAMES P. KEMP, ESQ.  
KEMP & KEMP, Attorneys at Law  
7435 W. Azure Drive, Suite 110  
Las Vegas, NV 89130  
Attorney for Plaintiff

21 **ORDER**

22 IT IS SO ORDERED:

23   
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: August 12, 2021  
26 \_\_\_\_\_  
27  
28